MERCER ISLAND LAW GROUP, PLLC

2448 76th Ave SE, Suite 100 Mercer Island, WA 98040

DECLARATION OF

GREGORY M. SKIDMORE - 1

Case 2:17-cv-00342-TOR ECF No. 24-1 filed 08/31/17 PageID.117 Page 1 of 2

- 5. Attached hereto as Exhibit 4 is a true and correct copy of the email correspondence and attached letter received from Dan English, Director of the Area Agency on Aging of North Idaho.
- Attached hereto as Exhibit 5 is email correspondence between counsel dated 6. July 21, 2017.
- 7. During the months of July and August, Plaintiff has made attempts to receive the necessary consent from the resident at Life Care's Sandpoint facility as required by Area Agency on Aging of North Idaho. Plaintiff has not been successful in obtaining the consent.
- 8. Plaintiff expects Ms. Dee Childers, owner and founder of Life Changes Elder Care Consulting LLC in Boise, ID to testify regarding the standard of mental abuse, how Plaintiff's conduct was not mental abuse, and to serve as rebuttal evidence to Defendant's expert, Demetria Heffenreffer.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Executed this 31st day of August, 2017.

Gregory M. Skidmore

AM. No